

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

United States of America and State of New York,
ex rel. Edward Lacey,

Plaintiff,

v.

Visiting Nurse Service of New York,

Defendant.

Civil Action No. 14-CV-5739 (AJN)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law; the Declarations of Gordon Schnell, Jacob Elberg, Heidi Wendel, and Eric Havian; and the exhibits attached thereto; Relator Edward Lacey ("Relator") respectfully moves this Court pursuant to Fed. R. Civ. P. 54(d), 31 U.S.C. § 3730(d), N.Y. Fin. Law § 190(6), and the parties' Settlement Agreement (ECF No. 204-1), to order Defendant Visiting Nurse Service of New York to pay Relator (i) \$10,110,337.50 in attorneys' fees; (ii) \$1,037,074.96 in costs and expenses; and (iii) the fees Relator incurred in making this motion in an amount to be identified in Relator's reply brief.

Respectfully submitted,
CONSTANTINE CANNON LLP



Dated: January 15, 2021

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